

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Wildfire Mitigation Plans**  
**Rulemaking 18-10-007**  
**Data Response**

PG&E Data Request No.:	CalAdvocates_040-Q05		
PG&E File Name:	WildfireMitigationPlans_DR_CalAdvocates_040-Q05		
Request Date:	February 19, 2021	Requester DR No.:	CalAdvocates-PGE-2021WMP-06
Date Sent:	February 24, 2021	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Alan Wehrman

The following questions relate to PG&E's 2021 Wildfire Mitigation Plan (WMP) Update.

**Subject: Mitigation program effectiveness and risk spend efficiency (RSE)**

**QUESTION 05**

In attachment 7.3.3\_RSE\_Input\_Template\_EO\_WLDFR.xlsm, on the worksheet "Summary of Programs," PG&E lists the effectiveness as 90% for the following programs:

7.3.3.1\_Capacitor maintenance and replacement program

7.3.3.4\_Covered conductor maintenance

7.3.3.5\_Crossarm maintenance, repair, and replacement

7.3.3.6\_Distribution pole replacement and reinforcement, including with composite poles

7.3.3.10\_Maintenance, repair, and replacement of connectors, including hotline clamps

7.3.3.12.3\_Other corrective action

7.3.3.13\_Pole loading infrastructure hardening and replacement program based on pole loading assessment program

7.3.3.14\_Transformers maintenance and replacement

Under both "Effectiveness %" and "Justification for Effectiveness %" for each of these programs, PG&E states, "Likelihood of ignition due to Equipment Failure of [equipment] – 90%."

- a. Please confirm whether the statement above indicates a 90% effectiveness in addressing the likelihood of ignition due to equipment failure.
- b. If the answer to part (a) is yes, please state the basis of your estimate of a 90% effectiveness for each of the above programs.

- c. Please confirm whether the statement above indicates a 90% likelihood of ignition in the event that a given piece of equipment fails.
- d. If the answers to parts (a) and (c) are both yes, please explain how a 90% likelihood of ignition due to equipment failure corresponds to 90% effectiveness.
- e. If the answer to part (a) is yes, state the basis of PG&E's representation that each of the above programs is equally effective.
- f. If the answer to part (c) is yes, state the basis of PG&E's indication that the likelihood of ignition is the same for all of the above types of equipment.
- g. If the answers to parts (a) and (c) are both no, please explain the meaning of "Justification for Effectiveness %" and "Likelihood of ignition due to Equipment Failure of [equipment] – 90%."

#### **ANSWER 05**

- a. Yes, the statement above indicates a 90% effectiveness in addressing the likelihood of ignition for the specific equipment failure sub-driver each program points to.
- b. Estimate is based on the elimination of a sub-driver failure time in combination with the exposure of the number of units/miles performed each year. 100% was not used to reflect that equipment sub-driver still has a potential to fail, so it was discounted to 90%.
- c. No, the statement does not indicate a 90% likelihood of ignition given a piece of equipment fails.
- d. Question is not applicable.
- e. The programs are not equally effective. Because the programs are applied at the subdriver level, explained in the 'Justification for effectiveness' and inputted in the '3-Eff – Freq Programs', the risk reduction calculation is calculated against the subdriver. The probability or frequency of that subdriver tied to a risk event is different for each subdriver. The frequency of each subdriver can be seen in the tag 'REF\_Freq'.
- f. Question is not applicable.
- g. Question is not applicable.

